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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,
)
Plaintiffs,
)
v.
)
BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,
)
Defendants.
)

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINES TO AMEND BRIEFING
SCHEDULE ON THE REFILED
SECOND MOTION TO COMPEL
(First Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the “Plaintiffs”), and the Defendant Bank of America (hereinafter “BANA”), by and through their respective attorneys of record, hereby jointly stipulate to modestly extend the briefing schedule set at the hearing dated September 28, 2021 for the Plaintiffs to refile their motion to compel at Doc. 151. (Doc. 181.) This is the first stipulation requesting an extension of time to extend

1 the deadlines in the briefing schedule involving the refiling of the Motion to Compel. (Doc. 151.) A
2 hearing is scheduled on this motion on November 16, 2021 at 10:00 a.m. PST and Plaintiffs' refiled
3 Motion to Compel is currently due October 12, 2021. (Doc. 181.) In support thereof, the Plaintiffs and
4 BANA represent as follows:

5 The Plaintiffs require additional time to restructure and otherwise revise the motion to compel
6 discovery in conformity with this Court's directives issued at the September 28th in-person hearing.
7 Plaintiffs requested the hearing's audio recording on September 29th and paid a court reporter for an
8 expedited transcript, which was received on the evening of October 1st. The Plaintiffs carefully
9 reviewed this Court's refiling instructions and recognized that the revised motion to compel could not
10 be filed by the October 12th deadline, even exercising all reasonable diligence. One particularly time-
11 consuming task is the presentation of and argument on over one hundred general and specific
12 objections to Plaintiffs' written discovery requests.

13 On Monday, October 4th, the Plaintiffs contacted BANA's counsel and discussed extending
14 the briefing deadlines. In addition to discussing dates for a stipulated briefing schedule, BANA offered
15 to provide Word drafts of its discovery responses to assist Plaintiffs in preparing the revised motion.
16 Plaintiffs reciprocated by providing BANA with a copy of the hearing transcript. Based on those
17 discussions, the Parties stipulate to the following briefing schedule: Plaintiffs refiled motion to compel
18 discovery due October 22, 2021 (previously due October 12, 2021); BANA's opposition due on
19 November 11, 2021 (previously due October 26, 2021); and the Plaintiffs' reply due on November 22,
20 2021 (previously due November 2, 2021). Based on this stipulation, the parties also respectfully
21 request a new hearing date on Plaintiffs' revised motion to compel discovery.

22 Accordingly, the Parties agree that the foregoing constitutes good cause to extend the briefing
23 schedule deadlines. This is the Parties' first request for an extension of the deadline related to the
24 refiled Second Motion to Compel. The Parties agree that the requested extension will not prejudice
25 any Party. No deadline for which an extension is requested herein has expired.

26 Accordingly, the Parties agree there is good cause for entry of the following new deadline:
27 Plaintiffs' time to refile the Motion to Compel is extended to October 22, 2021, BANA's time to file
28

1 an Objection to the Motion to Compel is extended to November 11, 2021, and Plaintiffs' Reply is
2 extended to November 22, 2021.
3

4 **IT IS SO STIPULATED.**

5 Dated: October 6, 2021
6 THE BERNHOFT LAW FIRM, S.C.

Dated: October 6, 2021
SNELL & WILMER, L.L.P.

7 /s/ Daniel J. Treuden
8 Daniel J. Treuden, Esq.
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11 Attorney for Plaintiffs
12 Appearing *pro hac vice*

/s/ Holly E. Cheong
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Attorneys for Bank of America, N.A.

20 **Order**

21 IT IS ORDERED that ECF No. 187 is
22 GRANTED. IT IS FURTHER ORDERED
23 that the motion hearing regarding
24 ECF No. 151 scheduled for 11/16/2021 is
continued to 11/30/2021 at 10:00 a.m.

25 **IT IS SO ORDERED**

26 **DATED:** 10:37 am, October 06, 2021

27 
BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE
28

Certificate of Service

I hereby certify that on October 6, 2021, I electronically filed and served the foregoing JOINT STIPULATION TO EXTEND DEADLINES TO AMEND BRIEFING SCHEDULE ON THE REFILED SECOND MOTION TO COMPEL with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Daniel J. Treuden
Daniel J. Treuden
Attorney for Plaintiffs